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Counsel for *Santa Rosa Mall, LLC*

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

SEARS HOLDINGS CORPORATION, *et al.*,

Debtors.

SANTA ROSA MALL, LLC,
Plaintiff,

v.

SEARS HOLDINGS CORPORATION; and
SEARS, ROEBUCK DE PUERTO RICO, INC.

Defendants.

Chapter 11

Case No. 18-23538 (RDD)

(Jointly Administered)

Adversary Proceeding
Case No. 19-08266 (RDD)

**STATEMENT CERTIFYING COMPLIANCE WITH ORDER GRANTING SANTA ROSA
MALL'S MOTION FOR LEAVE TO FILE UNDER SEAL AND NOTICE OF FILING
REDACTED COMPLAINT**
(Related Docket Nos. 4151, 4153, 4300)

TO THE HONORABLE COURT:

COMES NOW Santa Rosa Mall, LLC (“Santa Rosa Mall”), by and through its undersigned counsel, and respectfully states and prays as follows:

1. On June 7, 2019, Santa Rosa Mall filed a *Motion for Leave to File Under Seal* (the “*Motion*”, Lead Case Docket No. 4151) and an Adversary Proceeding Complaint (“*Complaint*”, Lead Case Docket No. 4153; Adv. Proc. Docket No. 1).
2. On June 20, 2019, the Court entered the *Order Granting Santa Rosa Mall’s Motion for*

Leave to File Under Seal (the “*Order*”, Lead Case Docket No. 4300; Adv. Proc. Docket No. 4) authorizing Santa Rosa Mall to file the *Complaint* and Exhibit VIII thereto under seal, and to file a redacted version of such *Complaint* on the public docket of the lead case and redacting only paragraphs 39, 40, 41, and 82, and Exhibit VIII thereto.

3. In compliance, we attach as **Exhibit A** the redacted *Complaint* and all exhibits in support thereof. Copies were provided to the Clerk of the United States Bankruptcy Court located at 300 Quarropas Street, White Plains, NY, along with a copy of the *Order* in an envelope marked “TO BE FILED UNDER SEAL.”

WHEREFORE, Santa Rosa Mall respectfully requests this Court take notice of the forgoing and deem the *Order* complied.

Respectfully submitted.
Dated: June 25, 2019.

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